

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

INGENIADOR, LLC,

Plaintiff,

v.,

ALFRESCO SOFTWARE, INC.; *et al.*,

Defendants.

CIVIL NO. 11-1840 (GAG)

**FIRST REQUEST FOR ENLARGMENT OF TIME  
TO PLEAD OR OTHERWISE DEFEND**

TO THE HONORABLE COURT:

COMES NOW the co-defendant named in the complaint as “**Objective Corporation USA, Inc.**” (“**Objective**”), specially appearing by and through its attorneys, without submitting to the jurisdiction or venue of this forum nor waiving any other defense, and hereby very respectfully requests a first extension of time of thirty (30) days, until **December 12, 2011**, to plead or otherwise defend as follows:

1. Upon information and belief, the plaintiff filed the captioned matter against Objective and other co-defendants on or about August 26, 2011. See, Docket No. 1.

2. On or about October 20, 2011, the plaintiff purportedly served or attempted to serve Objective with a copy of the complaint and summons. If service was properly effected, Objective would have until November 10, 2011 to plead or otherwise respond.

3. Objective needs more time to, among other things, analyze the plaintiff’s claims, ascertain whether service of process was effective, jurisdiction and venue proper, and determine how to plead or otherwise defend.

4. Therefore, pursuant to Local Rule 6 of this Court and Rule 6(a) of the Federal Rules of Civil Procedure (“FRCP”),<sup>1</sup> Objective requests a first extension of time of thirty (30) days counted from

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<sup>1</sup> According to Local Rule 6, “[t]he clerk is authorized to enter orders granting a first extension of time, provided it encompasses a period not to exceed thirty (30) days. Any further extensions of time can only be granted by the Court.”

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November 10, 2011 to plead or otherwise defend and/or request. The requested extension of time would expire on December 12, 2011.<sup>2</sup>

5. Also, Plaintiff's counsel has informed us that they do not object to the instant request.

**WHEREFORE**, pursuant to Local Rule 6 and FRCP 6(a), Objective moves for a first extension of time of thirty (30) days to respond to, or otherwise defend from, the plaintiff's complaint, said extension expiring on December 12, 2011.

I CERTIFY that today, I presented the foregoing to the Clerk of the Court for filing and uploading to the CM/ECF system which will send electronic notification of such filing to plaintiff's counsel.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 10<sup>th</sup> day of November, 2011.

**FIDDLER, GONZÁLEZ & RODRÍGUEZ, PSC**

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<sup>2</sup> Technically, the requested enlargement would expire on December 10, 2011. However, December 10, 2011 is a Saturday. Pursuant to FRCP 6(a)(1)(C), Objective would have until Monday, December 12, 2011, to plead or otherwise respond and/or request.